

1 Teresa M. Corbin (SBN 132360)
2 Denise M. De Mory (SBN 168076)
3 Ethan B. Andelman (SBN 209101)
4 Jaclyn C. Fink (SBN 217913)
5 HOWREY LLP
 525 Market Street, Suite 3600
 San Francisco, California 94105
 Telephone: (415) 848-4900
 Facsimile: (415) 848-4999

6 Attorneys for Defendants AEROFLEX INCORPORATED,
7 AEROFLEX COLORADO SPRINGS, INC., AMI
8 SEMICONDUCTOR, INC., MATROX ELECTRONIC
SYSTEMS, LTD., MATROX GRAPHICS INC., MATROX
INTERNATIONAL CORP., and MATROX TECH, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

16 AEROFLEX INCORPORATED, AMI
17 SEMICONDUCTOR, INC., MATROX
18 ELECTRONIC SYSTEMS LTD., MATROX
GRAPHICS INC., MATROX
INTERNATIONAL CORP., MATROX TECH,
INC., AND AEROFLEX COLORADO
SPRINGS, INC.

Defendants.

Case No. C03-4669 MJJ (EMC)

**DECLARATION OF ETHAN B. ANDELMAN
IN SUPPORT OF ADMINISTRATIVE
MOTION FOR A SEALING ORDER**

Judge: Hon. Edward M. Chen

DECLARATION OF ETHAN B. ANDELMAN

I, Ethan B. Andelman declare as follows:

1. I am an attorney at the law firm of Howrey LLP, counsel of record the Customer Defendants in the above-captioned action. I am also counsel of record for Synopsys in the companion case C03-2289. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. The Customer Defendants have lodged Exhibits 1, 2, and 3 to Exhibit A of Defendant's Motion for Leave to File the Supplemental Declaration of Denise M. De Mory in Support of Defendants' Opposition to Ricoh's Motion for Sanctions for Defendants' Violation of Judge Jenkins' CMC Order Regarding Identification of Products at Issue (the "lodged De Mory Exhibits") with the clerk pursuant to Civil Local Rule 79-5. The lodged De Mory Exhibits were generated by Ricoh in this litigation, and were designated pursuant to the protective order entered in this case.

3. The lodged De Mory Exhibits contain nonpublic Synopsys business information. Specifically, the lodged documents discuss the internal workings of Synopsys' Design Compiler product. This information is not publicly known and could cause Synopsys competitive harm were it to become publicly known.

4. Further, the lodged De Mory Exhibits contain nonpublic Customer Defendant business information. Specifically, the lodged documents contain portions of code used by the Customer Defendants to design their products. This information is not publicly known and could cause the Customer Defendants competitive harm were it to become publicly known.

5. Thus, Synopsys and the Customer Defendants believe that the lodged De Mory Exhibits are properly designated under the protective order entered in this case, and requests that the Court order the lodged De Mory Exhibits to be filed under seal.

Executed on April 18, 2006, at San Francisco, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Ethan B. Andelman

Ethan B. Andelman

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28